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December 10, 1998

***BY HAND DELIVERY***

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, DC 20554

**RECEIVED**  
DEC 10 1998  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

*RM-9108*

**Re: Docket No. RM9108**  
**Ex Parte Presentation**

Dear Ms. Roman Salas:

Pursuant to Section 1.1206 of the Commission's rules, this is to advise you that, in my capacity as counsel to Long Distance International Inc. ("LDI"), a provider of 1010XXX service, I, along with representatives of LDI met yesterday with Yog Varma, Deputy Bureau Chief, Common Carrier Bureau, Richard Cameron, Counsel to Bureau Chief, and Darius Withers, Attorney, Enforcement Division.

During this meeting, we discussed LDI's position with respect to the inability of interexchange carriers to identify incumbent local exchange carriers or competitive local exchange carriers for casual calls. A copy of the following enclosures were submitted to the above-referenced Commission staff:

- An LDI memorandum entitled "Casual Calling Problem" and
- An LDI written presentation describing LDI's business operations, outlining the casual calling problem, and setting forth possible solutions.

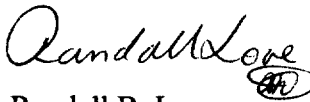
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Ms. Magalie Roman Salas  
December 10, 1998  
Page 2

In accordance with the Commission's rules, I am hereby submitting one original and one copy of this letter and its enclosures for the above-referenced proceeding.

Sincerely,

  
Randall B. Lowe

RBL/deb

Enclosures

cc(w/o encl.): Yog Varma  
Richard Cameron  
Darius Withers  
Dorothy Attwood  
Jonathan B. Mirsky  
Len Sawicki

# LONG DISTANCE INTERNATIONAL INC.





**Notes:**

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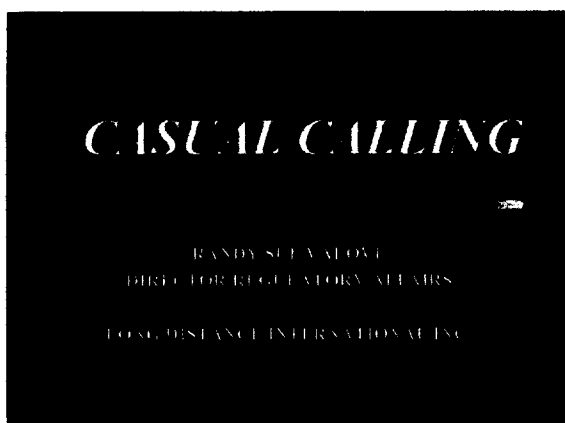
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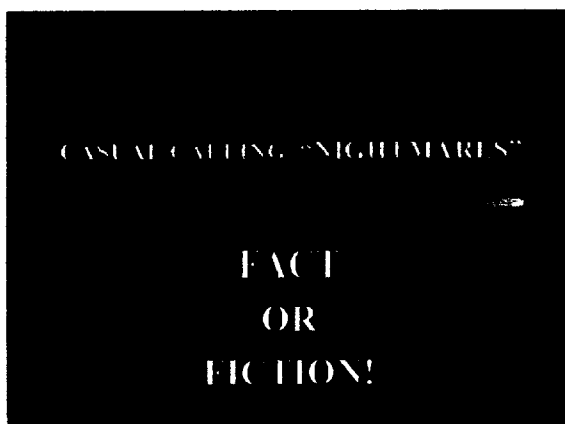
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## Notes:

LONG-DISTANCE INTERNATIONAL INC.

WHO ARE WE

- We are a leading provider of long-distance international services
- We are a leading provider of long-distance international services
- We are a leading provider of long-distance international services
- We are a leading provider of long-distance international services
- We are a leading provider of long-distance international services

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LONG-DISTANCE INTERNATIONAL INC.

WHY DOES LDI CARE ABOUT CASUAL CALLING

- Casual calling is a significant portion of our business
- Casual calling is a significant portion of our business
- Casual calling is a significant portion of our business
- Casual calling is a significant portion of our business
- Casual calling is a significant portion of our business

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MAJOR "CHALLENGES"

CHALLENGES CAUSED BY THE FOLLOWING

- Globalization
- Globalization
- Globalization
- Globalization
- Globalization

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**Notes:**

# CLECS

## CLEC RESELLERS

## DETAILS

## HOW DOES IT COMBAT THE PROBLEM TODAY?

- WHERE INFORMATION IS AVAILABLE FROM BOOKS, ALL ARE BELONGING TO FACILITIES BASED CUES.
  - IF THERE POSSIBLE, TRY TO GET AN ACCURATE VERSION OF INFORMATION FROM MANY SOURCES, i.e., BOOKS, AND BELONGING TO THE RESULTS *(e.g., e-mail)*.
- NOT AN OPTIMAL APPROACH TO CASUAL CUTTING**

## **Notes:**

### **PROPOSED SOLUTIONS**

#### **•• SHORT TERM**

- Better Enforcement of FCC's Debt Relief
- Better Enforcement and Control of ANS by CLEC Resellers
- Billing and Collection Agreements with carriers with the CLECS
- CLEC Resellers should not pay INC carrier caller bills

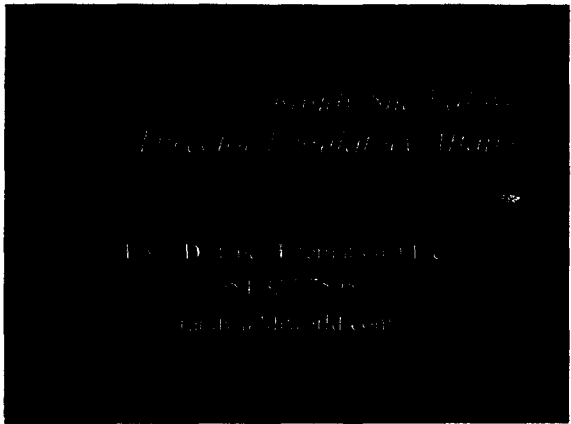
### **PROPOSED SOLUTIONS**

#### **•• LONG TERM**

- Build an "affordable" database similar to LDB accessible to all carriers
- Billing and Collection Agreements with CLECS and CLEC Resellers

### **THE "NIGHTMARE"**

- PERPETUATION OF FRAUD
- BLOCKING OF ANS
- LESS CONSUMER CHOICE
- POSSIBLE EXTINCTION OF CASUAL CALLING



**Notes:**

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# **CASUAL CALLING PROBLEM**

## **PROBLEM**

- The inability of interexchange carriers ("IXCs") to identify the incumbent local exchange carrier ("ILEC") or competitive local exchange carrier ("CLEC") for casual calls (*i.e.*, 1010XXX, 0<sup>+</sup>, 0<sup>-</sup>) thereby not allowing IXCs to determine whether it has a billing arrangement with the ILEC or CLEC which has the potential of encouraging consumer fraud.

## **REASON**

- With the introduction of competition to the local exchange and associated policies such as resale and local number portability, NPA-NXXs can no longer be identified with a particular ILEC or CLEC.

## **SOLUTIONS**

- A ten-digit line number data base, such as LIDB, that identifies an ILEC and CLEC.
- Require cost effective, non-discriminatory billing solutions, *i.e.*, require each LEC to offer billing and collection services at a reasonable prices.
- Realizing that the implementation of a ten digit line number data base may be time consuming, as an interim measure, require ILECs and CLECs to provide IXCs with a means by which to identify telephone numbers which they serve and, if necessary, protect such information by treating it as consumer proprietary network information. (47 U.S.C. § 222 (b), (c) 1996; 47 C.F.R. § 64.2005).

## **CONCLUSION**

- Absent an interim or long-term solution, customer choice through casual calling will become unavailable thus resulting in IXCs being forced to block such calls. In the process, the growth of ILECs, CLECs and IXCs will be inhibited.